

WELLINGTON CITY DISTRICT PLAN – DPC77



Further Submission form on publicly notified Proposed District Plan Change 77 Curtis Street Business Area

FORM 6, Clause 8 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE

Posted to	District Plan Team Wellington City Council PO Box 2199 Wellington 6011
Delivered to	Ground floor reception Civic Square/101 Wakefield Street Wellington
Faxed to	801 3165 (if you fax your submission, please post or deliver a copy to one of the above addresses) Please use additional sheets if necessary.
Emailed to	district.plan@wcc.govt.nz
We need to receive your submission by 5pm, Wednesday 12 June 2013.	

1. Your name and contact details:

Full Name: Transpower New Zealand Limited

Full Address: 96 The Terrace, Wellington

Address for service of person making submission:

Mike Hurley, Transpower New Zealand Limited, PO Box 1021, Wellington 6140

Email: environment.policy@transpower.co.nz

Phone: 04 590 7244

Fax:

2. I support or oppose the submission of:

(Please insert the name and address of original submitter, & submission number of original submission if available).

See attached table

3. The particular parts of the submission that I support (or oppose) are:

(You should clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the Proposed Plan Change).

See attached table

4. The reasons for my support (or opposition) are: (Please give precise details)

See attached table

5. I/we seek the following decision from the Council: (Please give precise details)

See attached table

6. Please indicate by ticking the relevant box whether you wish to be heard in support of your further submission.

I wish to speak at the hearing in support of my submission; or

I do not wish to speak at the hearing in support of my submission

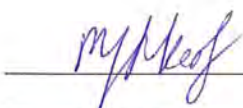
7. Joint Submissions

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

8. If you have used extra sheets for this submission please attach them to this form and indicate this below:

Yes, I have attached extra sheets No, I have not attached extra sheets

Signature of person making further submission (or person authorised to sign on behalf of submitter)



Date 12/06 2013

THANK YOU FOR MAKING A FURTHER SUBMISSION

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by the Wellington City Council, with submitters having the right to access and correct personal information.

Note: A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

**FURTHER SUBMISSIONS OF TRANSPOWER NEW ZEALAND LIMITED
ON SUBMISSIONS TO THE WELLINGTON CITY COUNCIL'S PROPOSED DISTRICT PLAN
CHANGE 77 CURTIS STREET BUSINESS AREA**

#	Submission	Relief Sought By Submitter	Position of Further Submitter	Reason For Support / Opposition
1	7 Ian Appleton	The submitter questions whether the presence of overhead power lines make the site unsuitable for housing, especially as the Council has allowed a child care facility to be built on site. If it is ok for a child care centre, surely it is ok for affordable housing.	Oppose	Transpower seeks that any new sensitive activities are a minimum of 12m from either side of the centreline of a National Grid transmission line. While Transpower was not involved in the application to establish the childcare facility it is noted that this is beyond the minimum 12m setback.
2	25 Jitesh Patel 43 Creswick Valley Residents Association Inc	No consideration has been given to potential EMF exposure of employees engaged in commercial activities on the site beneath the transmission lines.	Oppose in part	<p>Transpower takes safety seriously and operates the National Grid well within the recognised safe health limits for EMF exposure. Even directly beneath the lines, the measured field levels are well within the health protection guidelines.</p> <p>The New Zealand Ministry of Health recommends the health protection guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) to manage EMF associated with Transmission lines. Transpower is required to operate the transmission lines within the 1998 guidelines of a 100 μT (micro tesla) limit. Although the ICNIRP guidelines were updated in 2010, the Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009 (NESETA) is yet to be updated to reflect the latest revision. The 2010 ICNIRP guidelines revised the public exposure limit magnetic field from 100 to 200 μT (micro tesla) and NZ Ministry of Health recommend the revised limit.</p>

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				<p>The National Radiation Laboratory have previously undertaken measurements on the same transmission line as that which traverses the proposed Curtis Street Business Area, (the 110kV CPL-WIL-A line) in 2006. These were at 10 Shropshire Avenue, Wilton. The measurement of magnetic field directly beneath the line was 0.09 μT compared with the limit of 100 μT provided in the NESETA. The electric field was 0.005 kV/m compared with a limit of 5 kV/m.</p> <p>More information on EMF is available on the Transpower website at www.transpower.co.nz/EMF. Factsheet 3, shows information on typical field levels around the higher voltage 110kV and 220 kV transmission lines. The last two figures on pages 3 and 4 respectively, show the range of electric and magnetic fields measured beneath our transmission lines across our network and how the levels reduce rapidly with distance. Even directly beneath the lines, the measured field levels have always been measured to be well within the health protection guidelines.</p>
3	40 Frances Fiona Knight & Wayne Dexter Newman	The submitter questions the definition of "Sensitive activities".	Oppose	<p>Policy 11 of the National Policy Statement on Electricity Transmission states that:</p> <p><i>"Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent..."</i></p> <p>Transpower seeks that any new sensitive activities are a minimum of 12m from either side of the centreline of a National Grid transmission line.</p>

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				<p>Since lodging the submission, Transpower has continued to review the definition of sensitive activity and not considers that a more appropriate definition of sensitive activity for the Curtis Street Business Area would be:</p> <p><i>SENSITIVE ACTIVITIES AND USES:</i> means those activities and uses which are:</p> <ul style="list-style-type: none"> • schools, kindergarten or child care centres • homes for the elderly, hospitals, residential care facilities, premises with high density, low mobility uses • facilities critical to emergency response and utility lifelines • transport corridors to emergency services • residential activities (applies only in Central Area, Centres and Business Areas) • For the purposes of the National Grid Transmission Line that traverses the Curtis Street Business Area such activities are those activities listed in bullet points 1, 2 & 5 above.
4	Transpower New Zealand Limited	<p>Sought amendments to the definition of sensitive activities as follows:</p> <p><i>SENSITIVE ACTIVITIES AND USES:</i> means those activities and uses which are:</p> <ul style="list-style-type: none"> • schools, kindergarten or child care centres • homes for the elderly, hospitals, residential care facilities, premises with high density, low mobility uses • facilities critical to emergency 	Support in part	<p>Since lodging the submission, Transpower has continued to review the definition of sensitive activity and now considers that a more appropriate definition of sensitive activity for the Curtis Street Business Area would be:</p> <p><i>SENSITIVE ACTIVITIES AND USES:</i> means those activities and uses which are:</p> <ul style="list-style-type: none"> • schools, kindergarten or child care centres • homes for the elderly, hospitals, residential care

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		<p>response and utility lifelines</p> <ul style="list-style-type: none"> • transport corridors to emergency services • residential activities (applies only in Central Area, Centres and Business Areas) • <u>In the Curtis Street Business Area also includes those activities which are sensitive to the risks associated with high voltage transmission lines and associated adverse effects, because of either the period of exposure to the risk or the vulnerability of the population that is exposed to the risk. Such activities include those activities listed in bullet points 1, 2 & 5 above or other buildings occupied by people for 20 hours a week or more.</u> 		<p><i>facilities, premises with high density, low mobility uses</i></p> <ul style="list-style-type: none"> • <i>facilities critical to emergency response and utility lifelines</i> • <i>transport corridors to emergency services</i> • <i>residential activities (applies only in Central Area, Centres and Business Areas)</i> • <i>For the purposes of the National Grid Transmission Line that traverses the Curtis Street Business Area such activities are those activities listed in bullet points 1, 2 & 5 above.</i>
5	Transpower New Zealand Limited	<p>Sought amendments to Rule 36.5 as follows: 36.5 Non-Complying Activities <i>(a) The following are non-complying activities within 12m of the centreline of any electricity transmission line:</i> <i>(i) Sensitive activities and uses.</i> <i>(ii) Offices</i> <i>(iii) Retail Activities other than</i></p>	Support in Part	<p>Since lodging the submission Transpower has continued to review the approach it takes to manage the activities of other parties around the National Grid transmission lines. Transpower can accept commercial and industrial development on existing urban sites where safe separation distances from the transmission lines are maintained. On this basis Transpower no longer considers that bullet points 36.5 (a) (ii)-(iv) are required. Rule 36.5 could therefore be amended as follows: 36.5 Non-Complying Activities</p>

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		<p style="text-align: center;"><u>trade supply or yard based retail activities</u> (iv) <u>Places of assembly</u> (b) <u>Hazardous substance activities</u> (c) <u>Activities not provided for as permitted, controlled, restricted discretionary or discretionary activities.</u></p>		<p>(a) <u>Any sensitive activities and uses within 12m of the centreline of any National Grid transmission line:</u> (b) <u>Hazardous substance activities</u> (c) <u>Activities not provided for as permitted, controlled, restricted discretionary or discretionary activities.</u></p>
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